

Policy/Procedure Name:	Equality Impact Assessment Procedure		
Policy/Procedure Number:	ED001/PR01		
Date of Approval:	28 th November 2011		
Effective Date:	October 2011		
Revised Date:	May 2022		
Review by Date:	May 2023		
Policy/Procedure Author:	Equality and Diversity Coordinator		
Policy/Procedure Owner:	Principal		
Management Committee Approved By:	TLT		
Governor /Trustee Committee Approved By (where appropriate):	Not applicable		
For Action By:	All Policy/ Procedure Authors and Owners TLT/SMT Governors Trustees		
For Information to:	All Staff		
Approval requested to upload on the Treloar Website:	Yes <input checked="" type="checkbox"/> (tick if requested)		
Who is carrying out EIA? <small>(see details of EIA in appendix)</small>	NA	Date of EIA?	NA

1. Aims

- To use the EIA procedure to make sure that strategic decisions, policies, and related procedures, do what they are intended to do and for everybody (including staff and student communities, stakeholders, visitors, trustees and governors).
- To assess the likely (or actual) effects of policies and see whether they have the potential to affect people differently, in respect to age, gender, transgender, disability, religion/ belief, race, sexual orientation, pregnancy/ maternity and marriage/ civil partnership.
- To look for opportunities to promote equality that may have previously been missed or could be better used
- To remove or mitigate negative or adverse impacts of the strategic decision or policy/ procedure
- If any negative or adverse impacts amount to unlawful discrimination, they must be removed.

2. What is an Equality Impact Assessment? (EIA)

EIAs are a key tool in helping determine how strategic decisions, policies and procedures, or new proposals, will impact or affect different communities, especially those groups or communities who experience inequality, discrimination, social exclusion or disadvantage. These groups are defined by:

- Age
- Disability
- Gender
- Transgender
- Religion or belief
- Race
- Sexual Orientation
- Pregnancy/ Maternity
- Marriage/ Civil Partnership

Commonly included:

- *Socio Economic Background.*
- Under equalities legislation Treloars were required to take a prescriptive approach to meeting the requirement to eliminate unlawful discrimination, by carrying out 'equality impact assessments' on all of our policies and practices. As such we carried out a large number of impact assessments.

3. When and what to EIA?

When the Equality Act (2010) came into force, the requirement to pay due regard to the need to eliminate unlawful discrimination remained in force, but the prescriptive requirement to carry out impact assessments was removed in order to allow public bodies greater flexibility in how they meet this requirement. Treloar's carried out, and will continue to carry out, EIAs on all:

- Existing policies and procedures – as part of the policies approval process
- New internal or external policies – as part of the policies approval process
- Major changes that are made to an existing policy – as part of the policies approval process
- Papers proposing strategic decisions to TLT, the Governing Body and Trustees
- Papers proposing significant budgetary expenditure to TLT, the Governing Body and Trustees
- Marketing literature as it is being developed and prior to use
- Decisions made at TLT meetings – EIA is a standing agenda item for TLT meetings to identify any EDI implications of any decisions made.
- Changes or additions to services or when we create new services (including the curriculum)

Treloar's has a great focus on due regard. At anytime we become aware that an action may have a direct impact on any of the groups we will complete an EIA. See EIA template – appendix 1 & 2.

4. Possible Outcomes for EIAs/ Due Regard

An EIA has four possible outcomes:

Outcome 1: No Major Change

The process demonstrates that the policy/decision/proposal is robust; there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.

Outcome 2: Adjust

The process identifies potential problems or missed opportunities. Adjust the policy/decision/proposal to remove barriers or better promote equality. This should be included in the comments/ action plan section.

Outcome 3: Continue

The process identifies the potential for adverse impact or missed opportunities to promote equality. Clearly set out the justifications for continuing with the policy/decision/proposal in the comments/ action plan section. This justification should be in line with the Equality Act. For the most important relevant policy/decision/proposal, compelling reasons will be needed.

Outcome 4: Stop and remove

The policy/decision/proposal shows actual or potential unlawful discrimination. It must be stopped and removed or changed.

5. Getting ready to carry out EIAs

For Treloar's to be effective at demonstrating due regard, we will continue to show that a systematic process is used by all parts of the organisation.

This should include:

- Partnership working and shared policymaking responsibility
- Sound, consistent data collection and analysis
- Positive involvement and consultation, thereby improving outcomes and empowering both service users and employees (For example Staff and Student Voices conferences, surveys, questionnaires, etc.)

6. Use of the EIA / Due regard template

When carrying out an EIA or showing due regard the approved Treloar EIA templates must be used (included in this procedure). The purpose of these templates is to ensure a consistent approach to EIAs across the organisation and to assist with monitoring.

The template includes a box to write information about the policy/decision/proposal and its aims.

There are also questions to assist you in thinking about the evidence available and any gaps in evidence and how these will be filled.

In particular, the following should be identified:

- Who benefits from the policy/decision/proposal?
- Who doesn't benefit and why not?
- Who should be expected to benefit and why don't they?

Document the actual or likely impact, along with the evidence used to explain how that conclusion was reached. This should be included in the Comments/ Actions section.

7. Completed Templates

The completed templates should then be sent to the Equality and Diversity Coordinator or the Head of Quality for comments and review.

8. Publishing and review

The EIA is to be published with the policy and reviewed at each agreed review date for the policy/ procedure. Updates, adjustments and actions taken should be recorded in the EIA. Revisions to the EIA must then be sent to the Equality and Diversity Coordinator or the Head of Quality for monitoring.

Policy/Procedure Name: Equality Impact Assessment Procedure

Policy/Procedure No: ED001/PR01

Effective Date: October 2011

Review by Date: May 2023

9 Communication Requirements

How will the Policy/procedure be communicated:	Policy will be published on SharePoint. Senior Managers to ensure that the policy is used and staff are aware of it.
Who will ensure the above communication is carried out:	Senior Managers
Do the changes made to this policy/procedure affect any other policies/procedures? If yes, has this been communicated to the policy/procedure author/owner	

10 Inclusive communications

If you require this document in an alternative format, such as large print, audio description or a colour background, please contact quality@treloar.org.uk

11 Other Implementation Requirements

12 Monitoring and Review

As all current and new policies are released the Quality Manager/ EDI Coordinator will ensure that an EIA has been carried out.

13 Links to other related policies, procedures or documents (internal)

ED001 Equality, Diversity and Inclusion Policy
TLT001 Policy and Procedure Framework

14 Further sources of information (external)

15 References

This procedure includes information from the EHRC (Equality and Human Rights Commission) Equality Impact Assessment Quick-Start Guide. This can be found at www.equalityhumanrights.com

Codes of practice on the Equality Act and information about what constitutes unlawful discrimination can be found at www.equalityhumanrights.com

16 Definitions

EIA = Equality Impact Assessment

17 Revision History

Listed below is a brief audit trail, detailing amendments made to this policy procedure in last 4 years

Date	Page/para No.	Brief description of the change(s)	Change made by

IMPORTANT NOTES:

It is essential for those with designated responsibilities to familiarise themselves with the sources of information, referred to above.

Policy documents describe mandatory minimum standards and will be subject to audit and review. Line managers are required to ensure suitable and sufficient arrangements are in place to meet policy requirements, including the provision of information and instruction to staff.

Appendix 1 - Equality Impact Assessment (EIA) - Stage 1

Name of Policy / Function/Decision					
Name of Assessor / Author /Lead					
Start Date					
This EIA is being undertaken because it is:	<i>Delete as appropriate</i> <ul style="list-style-type: none"> • Part of a project proposal submission • A result of organisational change • A result of new policy • A result of a policy revision Other:				
Screening					
Does the policy affect employees, students or other stakeholder groups? Could the impact be significant to that group of people?					Y/N
Is it a major policy with a significant effect on how our core business is delivered?					Y/N
Does it involve a significant commitment of resources?					Y/N
Does it relate to an area where there are known inequalities (e.g. gender pay gap, hate crime, accessibility of IT)					Y/N
If the answer to any of these questions is 'YES' then continue to complete Equality impact assessment. If you are unsure about the answer to any of these questions please contact EDI co-ordinator or Head of Quality for further support.					
Has the screening identified the policy as having relevance to the any of the following groups?					
Age	Y/N	Disability	Y/N	Sexual Orientation	Y/N
Race	Y/N	Sex/Gender	Y/N	Religion or Belief	Y/N
Gender Reassignment	Y/N	Pregnancy or Maternity	Y/N	Marriage or civil partnership	Y/N
Have we shown due regard for the 9 protected characteristics within the policy/ procedure/ decision?				Yes <input type="checkbox"/> No <input type="checkbox"/>	
Are all opportunities to promote equality taken within the policy/ procedure/ decision?				Yes <input type="checkbox"/> No <input type="checkbox"/>	
Have we stated how we will monitor the implementation and impact of this policy/decision?				Yes <input type="checkbox"/> No <input type="checkbox"/>	
Date of Screening					
Approval by EDI					
Refer Policy/Procedure to EDI Co-ordinator for further Stage 2 Assessment (if required)				Yes <input type="checkbox"/> No <input type="checkbox"/>	

Appendix 2 – Stage 2 Equality Impact Assessment Template

(Use if required)

Relevance	
<p>Outline the relevance of the policy, service or function to the general equality duties and equality groups (remembering to consider each of the general duties and not only the duty to eliminate discrimination).</p> <p>This should include which aspects of the policy, service or function are relevant to which duties.</p>	
<p><i>Where it is considered that a policy is not relevant, this should be recorded here with the reasons and advice. Relevance may be obvious, in which case go straight to an assessment and detailed collection of data. In other instances a screening exercise might be necessary, which will use data to identify relevance.</i></p> <p>For help on completing this section contact the <i>EDI co-ordinator</i>.</p>	
Scoping of the Equality Impact Assessment	
1	<p>What are the main aims, purpose and outcomes of the policy? What do you hope to achieve by it? Who will benefit?</p>
2	<p>What aspects/activities of the policy are particularly relevant to equality?</p>
3	<p>What evidence is already available that will help in the development of both the policy and the EIA?</p> <p><i>Your EIA must include equality monitoring data gathered by your department or Treloar.</i></p> <p><i>If there is no equality monitoring data available, you need to set out how you will capture this information in the future (in box 4 below).</i></p> <p><i>For any further advice or support on this section please contact EDI co-ordinator</i></p>
4	<p>Do you require further information to gauge the probability and/or extent of impact?</p> <p><i>If No, please go onto the next section.</i></p> <p><i>If Yes, please explain how you will fill any evidence gaps</i></p> <p><i>Be specific - Outline how you will collate evidence, the time frames and responsibilities for doing so.</i></p>
<p>Y/N</p> <p>Explanation:</p>	

Policy/Procedure Name: Equality Impact Assessment Procedure

Policy/Procedure No: ED001/PR01

Effective Date: October 2011

Review by Date: May 2023

Which communities and groups will need to be involved in the development of the policy?

Please indicate:

- *The consultation that has taken place, with whom, when and how.*
- *Summary of the feedback.*
- *Link to any written record of the consultation so that it can be published alongside this assessment (if it is not provided your assessment cannot be signed off by the EDI co-ordinator); and*
- *How you will continue to gain stakeholder views once your policy has been implemented.*

5

You are required to involve and consult stakeholders during your EIA.

The extent of the consultation should be proportionate to the nature of the policy. All major work programmes and strategies should make arrangements to consult through assessment.

That includes gathering views on the initial aims of the policy and also on any impact.

This should allow an informed view to be given on the options identified, as well as the assessment of impact. Stakeholders' views on the most effective methods of addressing unwanted impacts should be considered.

Following consultation and involvement it may be necessary to go back to the assessment and revise your findings.

Step 2 Policy Drafting and Assessing Impact

Policy Drafting and Assessing Impact

When answering this section you will need to ensure that each of the relevant general duties is addressed, as well as each of the relevant policy aspects, both identified above.

You should consider:

- What are the main findings from your involvement and consultation, and do they demonstrate problems that need to be addressed?
- Could the policy outcomes differ according to people's ethnic group, gender, age, disability, religion or belief, or sexual orientation?
- Is there evidence of higher or lower participation or uptake by different groups?
- Could the policy or practice affect different groups disproportionately?
- If there will be a greater impact on one group, is that appropriate and consistent

Policy/Procedure Name: Equality Impact Assessment Procedure

Policy/Procedure No: ED001/PR01

Effective Date: October 2011

Review by Date: May 2023

with the policy objective?

- Could the policy or practice disadvantage people of one or more group? It is essential to consider not just the intended consequences of the policy or practice but also any unintended consequences or barriers that might prevent it being effective for certain groups.
- Is there any evidence that any part of the proposed policy could discriminate unlawfully, directly or indirectly, against people from groups?
- Does the policy include lawful positive action or other methods to address particular needs that should be retained?
- Does the policy miss potential opportunities to promote equality and ensure equitable outcomes for different communities and groups?
- Is there an opportunity to promote positive attitudes to disabled people and good relations between different groups and communities?
- Does the policy have a bearing on participation in public life?
- If so, can participation of disabled people be promoted and are other groups under represented?
- Is the proposed policy likely to affect relations between certain communities or groups, for example because it is seen as favouring a particular group or deny opportunities to another?

For any further advice or support on this section please contact *EDI co-ordinator*

What kind of equality impact can you see being evidenced in respect of the individual equality duties?

Please provide as much detail as possible to show how you have reached your conclusions.

What can you do to maximise opportunities to further promote equality and ensure equitable outcomes for different communities and groups?

What is the outcome of the Equality Impact Assessment? (Choose ONE option)

No major change – the EIA demonstrates that the policy is robust and that the evidence shows no potential for discrimination and that all opportunities to promote equality have been taken.	Y/N
Adjust the policy to remove barriers or to better promote equality	Y/N
Continue the policy despite potential for adverse impact or missed opportunities to promote equality	Y/N

Stop and remove the policy – if the policy shows actual or potential unlawful discrimination it must be stopped and removed or changed.	Y/N
---	-----

Action Plan			
<p><i>An action plan should be developed, monitored and reviewed.</i></p> <p><i>For any further advice or support on this section please contact EDI co-ordinator</i></p>			
Action	Owner	Due Date	Expected Outcome

Step 3 Putting in Place Monitoring, Evaluation and Review Approaches

Monitoring and Review	
<p><i>EIA is an ongoing process that does not end once a document has been produced.</i></p> <p><i>Any review of this EIA should consider the actual impact of a policy and should be undertaken no later than one year after its introduction.</i></p> <p><i>This is not to repeat the EIA, but to go back to the original reassessment and using the information and experience gained, check the findings and make any necessary adjustments. The EIA should document any reasons for not reviewing within a year (i.e. very low relevance to equality).</i></p> <p><i>For further support in completing this section please contact EDI co-ordinator.</i></p>	
<p>What monitoring mechanisms do you have in place to assess the actual impact of your policy?</p>	
<p>What date will this EIA be reviewed?</p> <p><i>If this is not within one year, please provide an explanation.</i></p>	<p>Date:</p> <p>Comments:</p>

Step 4 Signing Off and Publishing the Policy

Once the EIA is complete it should be submitted to EDI for sign off .	
Approved by EDI	Date: Name:
Approved by Policy Lead	Date: Name:

Step 5 Monitoring and Reviewing the Action Plan

The following section is to be completed when the EIA is reviewed.		
Review of EIA		Update / Observations / Changes:
Review Approved by EDI		Name:
Review Approved by Policy Lead		Name:
Date of Next Review		If no further review required – evidence here: